

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Middle District of Pennsylvania

United States of America)

v.
Tyrie Dunn
a.k.a. Tyree Dunn)

Case No. 3:25-mj-6)

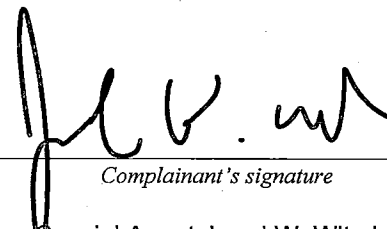
Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 20th, 2025 to present in the county of Schuylkill in the
MIDDLE District of PENNSYLVANIA, the defendant(s) violated:Code Section
18 U.S.C. Sec. 1073Offense Description
Unlawful Flight to Avoid Prosecution (UFAP)FILED
SCRANTON

JAN 27 2025

PER JKC
DEPUTY CLERKThis criminal complaint is based on these facts:
SEE ATTACHED AFFIDAVIT of Federal Bureau of Investigation, Special Agent Jared W. Witmier☒ Continued on the attached sheet.

Complainant's signature

Special Agent Jared W. Witmier

Printed name and title

~~Sworn to before me and signed in my presence.~~Attested to by the applicant in accordance with the
requirements of Fed. R. Crim. P. 4.1 by telephone.

Date:

1/27/25

Judge's signature

City and state:

Scranton, PA

Phillip J. Caraballo, U.S. Magistrate Judge

Printed name and title

CONTINUATION SHEET IN SUPPORT OF
CRIMINAL COMPLAINT

I, Jared W. Witmier, being duly sworn, according to law, upon my oath, depose and say:

1. I am employed as a Special Agent with the Federal Bureau of Investigation (FBI) and have been so employed since August 2003. I am assigned to the Philadelphia Division, Allentown Resident Agency. I have been involved in and have conducted numerous criminal investigations, many of which have involved charging individuals with similar crimes. I am authorized to investigate crimes against the United States of America and to perform other law enforcement duties as authorized by law.

2. Except where otherwise noted, the information set forth herein has been provided to me by other law enforcement officers. Unless otherwise noted, when referencing statements made, the information was provided to me by other law enforcement officers, who may have had either direct or hearsay knowledge of the statement, with whom I have spoken or whose report I have read and reviewed. Since the information contained herein is being submitted for the limited purpose of securing an Arrest Warrant, I have not included each and

every fact known to me concerning this investigation, but have set forth only those facts relevant and necessary to establish probable cause to believe that TYRIE DUNN, a.k.a. TYREE DUNN, committed and continues to commit the act of Unlawful Flight to Avoid Prosecution, Title 18, United States Code (USC), Section 1073.

PROBABLE CAUSE

3. On January 20, 2025, the Pottsville Police Department (PPD) secured an Arrest Warrant for the subject, TRYIE DUNN. This Arrest Warrant stems from charges filed against TYRIE DUNN by PPD, to include but not limited to the following violations: 18 Pa. C.S. 3301 (a.1)(1)(ii) Aggravated Arson – Person Present Inside Property; 18 Pa. C.S. 3302 (a) Causing a Catastrophe; and 18 Pa. C.S. 2702 (a)(1) Aggravated Assault.

4. On January 21, 2025, PPD requested the FBI assist them with locating and apprehending TYRIE DUNN for the aforementioned charges.

5. As of this date, January 22, 2025, all attempts to locate TYRIE DUNN have been unsuccessful.

6. Shortly after charges were filed by the PPD on January 20, 2025, various local media outlets released the contents of the arrest warrant for TYRIE DUNN providing public notice of the pending arrest warrant.

7. During the course of PPD's investigation to support the aforementioned charges, PPD identified a gray Kia Forte, Washington State license plate number CJN1997, for which they believe TYRIE DUNN was operating at the time of the alleged offenses.

8. A review of License Plate Reader (LPR) data for multiple states to include Pennsylvania, New Jersey, and New York, have identified the aforementioned vehicle both parked and driving in the area of Bronx, New York, from approximately January 23, 2025 to the present.

9. The aforementioned vehicle is registered to Enterprise Rent-A-Car. Per Enterprise Rent-A-Car, the aforementioned vehicle was rented by Sophiko Gagua. Based on prior contacts between Pennsylvania State Police and Sophiko Gagua, it is believed Sophiko Gagua is married to TYRIE DUNN.

10. The Pennsylvania State Police have obtained a court order to obtain location data for a cellular-phone believed to be in TYRIE DUNN's possession. A review of location data for the aforementioned cellular-phone from January 24, 2025 to present, indicated the cellular-phone being located in the area of Bronx, New York.

CONCLUSION

11. Based upon the above, there is probable cause to believe that TYRIE DUNN continues to avoid prosecution. It is therefore requested that an arrest warrant be issued for TYRIE DUNN, charging him with violation of Title 18, USC, Section 1073, in that TYRIE DUNN has fled to the state of New York to avoid prosecution for crimes committed in the Middle District of Pennsylvania.